

REMARKS

The amendments and remarks presented herein are generally consistent with the remarks made by Applicant's representative in the telephone call of July 13, 2007. Accordingly, entry of this amendment and reconsideration of the pending claims is respectfully requested.

The Office Action, mailed November April 16, 2007, considered and rejected claim 1-39, 41 and 42. Each of the claims were rejected under 35 U.S.C. § 102(e) as being anticipated by *Kucharewski* (U.S. Publ. No. 2004/0199581).¹

By this paper, claims 1, 9, 20, 34 and 37 have been amended, claim 42 added, and no claims have been cancelled.² Accordingly, following this paper, claims 1-39, 41 and 42 are pending, of which claims 1 20, 34 and 37 are the only independent claims at issue.

The claimed embodiments of the present invention are directed to a methods and computer program products for allowing a variety of applications to initiate communication with a contact by utilizing a centralized store of contact information. As recited in independent claim 1, for example, a plurality of contacts are created with contact information that can be utilized by the various applications to initiate network communication with the plurality of contacts, and the contact information is stored in a centralized contact store accessible to the various applications. A contact interface is also provided which displays contact information in a display window. The same display window is also adapted such that it displays one or more user-selectable links simultaneous with the contact information, and the user-selectable links are configured to launch one or more of the multiple applications that initiate network communication with the contact. An application is launched in response to user selection of a corresponding link from the same window displaying the contact information, and the application may then receive access to a contact and its corresponding contact information through the contact interface or one or more other interfaces. The ability of the applications to then retrieve the contact information and utilize the information to initiate network communication with the contact is then enabled.

Independent claim 20 is directed to a computer program product which includes computer-executable instructions for implementing a method corresponding to the method of

¹ Although the prior art status of the cited art is not being challenged at this time, Applicant reserves the right to challenge the prior art status of the cited art at any appropriate time, should it arise. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status of the cited art.

² Support for the claim amendments and new claims is found, by way of example and not limitation, in the disclosure found in paragraphs 115, 116 and 127-134, as well as in Figures 5-7 and 9 of Applicant's originally filed application.

claim 1. Independent claims 34 and 37 are directed to a method and computer program product, respectively, for implementing a similar method in which contact information is modified and updated on an application-specific database.

As is axiomatic, a rejection under 35 U.S.C. § 102(e) requires that the cited reference disclose all elements of the pending claim. In particular, a "claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." (M.P.E.P. § 2131; *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987)). Furthermore, not only must each element be expressly or inherently described, but it must be recited in the same arrangement and detail as recited in the claim. Specifically, broad recitations of elements or functions are not sufficient to sustain a rejection of specific elements of a claim inasmuch as the "identical invention must be shown in as complete detail as is contained in the claim," and the elements must be arranged as required by the claim. (M.P.E.P. § 2131; *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 U.S.P.Q.2d 1913, 1929 (Fed. Cir. 1989)).

While *Kucharewski* generally relates to methods and systems for adding contacts to groups of contacts and establishing communication with those groups of contacts, it fails to teach or suggest each and every limitation of the present invention, particularly in the detail and arrangement as recited in the claims. For example, among other things, *Kucharewski* fails to disclose or suggest a contact interface which has a display window which simultaneously displays, in the same window, contact information and user-selectable links for launching applications, as recited in combination with the other claim elements. In fact, it appears that *Kucharewski* discloses the contrary in that it discloses applications which launch a contact information display window, rather than a contact information display window with links to launch applications.

More particularly, *Kucharewski* discloses that a list of contacts is created and stored in a central repository from which one or more communication applications can access the information to communicate with a listed contact. (§§ 2-4, 24, 44). Further, the primary crux of *Kucharewski* is that these contacts may further be grouped together into people lists which identify a collection of people which may be used for various purposes, and which is also stored in the central repository for access by multiple applications. (§§ 49, 50). For example, the people list may be used to identify a group of people as recipients of an email or instant message, to specify contacts that receive updated to address information or alerts and reminders from an

alerting application, or in a filter to identify specific contacts from whom emails are accepted or rejected. (§§ 52, 53).

To use a people list when sending the message, each of the applications is provided access the central repository of people lists when addressing a message. (§ 51). In particular, an application accesses the central repository of people lists by displaying a selection interface which enables specification of the recipients of a message sent by the particular application. (§§ 51, 66). In this manner, the application launches a contact information selection interface where the user can select one or more people or people lists as a recipient and the message; the corresponding information about the selected contacts is then placed within the details field of the message to be sent. (§ 68). The message can then be sent to the selected contact or, in the case of a people list, to each of the people identified in the people list. (§ 51).

Additionally, when a particular application accesses the people lists by calling up the selection interface, people in the people list will not all have the same types of information stored, such that some people have more or different information than others. In the event that the particular application uses a communication technique for which a person in the people list does not have corresponding information, the user of the application will be prompted to enter the necessary information for communication by the selected application, or, if not prompted for additional information, the contact without the necessary information will be excluded from the communication. (§55).

Thus, *Kucharewski* appears to teach a system in which a message is sent by: (1) creating a message within an application; (2) accessing a selection interface from the application to choose a contact or list; (3) addressing the message to the selected contact or list; and (4) sending the message to the selected contact or list members. (§§ 82-84). In other words, *Kucharewski* appears to disclose a system in which the application launches the contact information selection interface. This is in direct contrast to the pending claims identified above in which the contact interface's display window displaying contact information to a user and simultaneously displays, in the same window, one or more selectable links for launching the applications which initiate network communication with a contact, as recited in combination with the other claim elements. In other words, Applicant's invention includes an interface with a display window having links which launch the applications, where *Kucharewski* includes a selection interface which is launched by the application.

Stated simply, *Kucharewski* fails to disclose any display window which simultaneously displays: (a) contact information for one or more contacts; and (b) user selectable links for launching an application. Notably, on page 8 of the Office Action, the Office states that *Kucharewski* does disclose a contact interface which displays contact information of a contact (citing to Fig. 3 and ¶¶ 11 and 46 of *Kucharewski*), and that *Kucharewski* discloses the ability to launch/initiate/activate several different communication applications in order to send a communication (citing to ¶¶ 32, 47 and 54 of *Kucharewski*). Notably, however, the Office Action does not contend, nor do the cited figure or paragraphs support, a disclosure of the same interface which displays the contact information also including user-selectable links to launch the applications. Indeed, *Kucharewski* merely discloses that a GUI is used to select a contact or people list. In the only detailed description of this GUI, and as shown in Figure 5, while the display window is shown to include contacts and options to select or edit a contact/people list, or to close the window, it doesn't include any selectable link to launch an application which initiates network communication. Any link to launch an application using the contact information is therefore external to the contact information display window in *Kucharewski*. Indeed, as noted above, inasmuch as *Kucharewski* expressly discloses that each application launches the same selection interface to enable selection of the recipients of a message, it discloses that applications launch the selection interface, whereas the claims recite a selection interface used to launch the applications. Such a disclosure clearly fails to recite each of the cited claim elements, particularly when considering that such must be disclosed in at least the same level of detail, and in the same arrangement, as the recited claims.

Although the foregoing arguments are specifically related to the independent claims it will be appreciated that, for at least the foregoing reasons, all of the other rejections and assertions of record with respect to the dependent claims are now moot, particularly when

considering the combination with elements recited in the corresponding independent claims.³
Therefore, the dependent claims need not be addressed individually.⁴

For at least the foregoing reasons, Applicants respectfully submit that the pending claims 1-39, 41 and 42 are neither anticipated by nor made obvious in view of the cited art of record. In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney by telephone at (801) 533-9800.

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Respectfully submitted,



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³ It will be appreciated, however, that this should not be construed as Applicants acquiescing to any of the purported teachings or assertions made in the last action regarding the cited art or the pending application, including any official notice. Instead, Applicants reserve the right to challenge any of the purported teachings or assertions made in the last action at any appropriate time in the future, should the need arise. Furthermore, to the extent that the Examiner has relied on any Official Notice, explicitly or implicitly, Applicants specifically request that the Examiner provide references supporting the teachings officially noticed, as well as the required reason to combine/modify the relied upon references with the other supporting the Official Notice.

⁴ Nevertheless, and by way of example and not limitation, Applicant notes that *Kucharewski* also fails to disclose a method or computer-program product as recited in claims 34-39, in the centralized store updates application-specific contact directories which are used by a selected application to obtain the contact information. While *Kucharewski* does disclose that contact information can be edited and the changes made to other copies of the information, such updates are not disclosed as being in an application-specific contact directory, as recited in combination with the other claim elements. (See Fig. 6; ¶¶ 51, 70, 81). Indeed, such updates are made to recipient specific directories or to device specific directories. However, even where the repository is copied to a recipient or device specific location, the repository is nonetheless accessible to each of the applications available to that user or accessible on that device. (¶¶ 50, 51, 81)